

UNITED STATES BANKRUPTCY COURT  
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA

IN RE: ANNA M. YOCUM : CHAPTER 13  
Debtor :  
 :  
JACK N. ZAHAROPOULOS :  
STANDING CHAPTER 13 TRUSTEE :  
Movant :  
 :  
vs. :  
 :  
ANNA M. YOCUM :  
Respondent : CASE NO. 1-22-bk-00657

TRUSTEE'S OBJECTION TO CHAPTER 13 PLAN

AND NOW, this 9th day of June, 2022, comes Jack N. Zaharopoulos, Standing Chapter 13 Trustee, and objects to the confirmation of the above-referenced debtor's plan for the following reason(s):

1. Schedule B lacks description – vehicle is incorrect.
2. The Trustee avers that debtor's plan is not feasible based upon the following:
  - a. The plan is underfunded relative to claims to be paid – 100% plan. Also, M & T's arrearage claim is \$44,010.00 and not \$16,000.00.
  - b. Secured claims not in plan – Claims #2 and #3.
3. The Trustee provides notice to the Court as to the ineffectiveness of debtor's Chapter 13 Plan for the following reasons:
  - a. Clarification of vesting of property. Because non-exempt equity exists, the plan should provide for vesting at closing. Accordingly, the plan violates § 1325(a)(4).

WHEREFORE, Trustee alleges and avers that debtor's plan is nonconfirmable and therefore Trustee prays that this Honorable Court will:

- a. Deny confirmation of debtor(s) plan.
- b. Dismiss or convert debtor(s) case.
- c. Provide such other relief as is equitable and just.

Respectfully submitted:

/s/Jack N. Zaharopoulos  
Standing Chapter 13 Trustee  
8125 Adams Drive, Suite A  
Hummelstown, PA 17036

CERTIFICATE OF SERVICE

AND NOW, this 15th day of June, 2022, I hereby certify that I have served the within Objection by electronically notifying parties or by depositing a true and correct copy of the same in the United States Mail at Hummelstown, Pennsylvania, postage prepaid, first class mail, addressed to the following:

Jerry Philpott, Esquire  
227 N. High Street  
P.O. Box 116  
Duncannon, PA 17020

/s/Deborah A. Behney  
Office of Jack N. Zaharopoulos  
Standing Chapter 13 Trustee